

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: : **Chapter 13 Proceedings**
Johntory Reese and : **Case No.: 18-61773**
Janice Kay Reese, : **Judge Russ Kendig**
Debtors.

**TRUSTEE'S OBJECTION TO PROPOSED MODIFICATION OF PLAN
AND NOTICE OF HEARING**

Now comes Standing Chapter 13 Trustee, Dynele L. Schinker-Kuharich, and objects to the Modification of Plan filed by Debtor(s). For her objection, Trustee asserts the following:

Debtor(s) cannot suspend payments when a mortgage is being paid by Trustee.

WHEREFORE, in view of the foregoing, Trustee prays for an order which denies Debtor's proposed Modification of the Chapter 13 Plan filed on or about August 6, 2020.

Respectfully submitted,

/s/ Dynele L. Schinker-Kuharich
Dynele L. Schinker-Kuharich
Chapter 13 Trustee
A. Michelle Jackson Limas (0074750)
Staff Counsel to the Chapter 13 Trustee
200 Market Avenue North, Ste. 30
Canton, OH 44702
Telephone: 330.455.2222
Facsimile: 330.754.6133
Email: DLSK@Chapter13Canton.com

NOTICE OF HEARING

Kindly take notice that Trustee's Objection to Modification of Plan regarding the above captioned Debtor(s), will come on for hearing on **September 16, 2020 at 2:00 p.m.** Said hearing will take place in the U. S. Bankruptcy Court, Ralph Regula Federal Building, 401 McKinley Ave SW, Canton, Ohio 44702.

/s/ Dynele L. Schinker-Kuharich
Dynele L. Schinker-Kuharich
Chapter 13 Trustee
A. Michelle Jackson Limas (0074750)
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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2020, a true and correct copy of the notice was served via the Court's Electronic Case Filing System upon these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Office of the United States Trustee at [RegisteredEmailAddress]@usdoj.gov
- Office of the Chapter 13 Trustee at dlsk@Chapter13Canton.com
- GIANCARLO VARIOLA, Counsel for Johntory and Janice Kay Reese, at jvariola@gmail.com

and via regular U.S. Mail, postage prepaid, upon:

Johntory & Janice Reese, Debtors
78 South Trimble Road
Mansfield, OH 44906

/s/ Dynele L. Schinker-Kuharich
Dynele L. Schinker-Kuharich
Chapter 13 Trustee